ATTACHMENT “B”-STATEMENT OF BASIS

Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

DRAFT PERMIT NO. F-01-017
REDLINE RACING AND RESTORATION, INC.
1031 BROWN STREET, PADUCAH, KENTUCKY
MAY 17, 2001
FROUGH SHERWANI, REVIEWER
PLANT I.D. # 021-145-00087
APPLICATION LOG # 53810

SOURCE DESCRIPTION:

REDLINE RACING AND RESTORATION, INC is located at Paducah, Kentucky, manufactures fiberglass kiosks for the Dip-N- Dots Company as well as various types of fiberglass automotive bodies.

Emission Point	**01**	**Fiber Glass Operation**
	MP1	**Gelcoat Application**
	MP2	**Resin Appliaction**
	MP3	**Catalyst**
	MP4	**Clean Up**

MP1:

This point is for gelcoat operation. The air-assisted HVLPF spray gun rated 0.75 gallons per minute is used for this operation. There is no control of any pollutant at this point. This operation runs 175 hr per year. The "PTE" is based on 0.9 gallons per hour. The assumed transfer efficiency of the system is 70%.

MP2

This point is for Resin operation. The magnum chopper system ATC-4000 air-assisted airless spray gun rated 4.6 gallons per minute is used for this operation. There is no control of any pollutant at this point. This operation runs 87.5 hr per year. The "PTE" is based on 2.76 gallons per hour. The assumed transfer efficiency of the system is 90%.

MP3

This point is for catalyst. The consumption of catalyst is 1.6 gallons per hr. The "PTE" is based on 8760 hrs per year.

MP4

This point is for clean up solvent. The consumption of solvent is 0.104 gallons per hr. The "PTE" is based on 8760 hrs per year.

Emission Point	**02**	**Car Restoration Operation**
	MP1	**Paint Shop**
	MP2	**Base Coat**
	MP3	**Base Coat Tint**
	MP4	**Clear Coat**
	MP5	**Catalyst/ Hardners**
	MP6	**Reducer**
	MP7	**Clean Up Solvent**

MP1

This point is for paint shop. The consumption of the paint is 3.75 gallons per hr. The "PTE" is based on 8760 hrs per year. The assumed transfer efficiency of the system is 60%. There is a fabric filter to control particulate matter. The control efficiency of the filter is 90%.

MP2

This point is for Base coat application. The consumption of the paint is 3.75 gallons per hr. The "PTE" is based on 8760 hrs per year. The assumed transfer efficiency of the system is 60%. There is a fabric filter to control particulate matter. The control efficiency of the filter is 90%.

MP3

This point is for Base coat Tint application. The consumption of the paint is 3.75 gallons per hr. The "PTE" is based on 8760 hrs per year. The assumed transfer efficiency of the system is 60%. There is a fabric filter to control particulate matter. The control efficiency of the filter is 90%.

MP4

This point is for clear coat application. The consumption of the paint is 3.75 gallons hr. The "PTE" is based on 8760 hrs per year. The assumed transfer efficiency of the system is 60%. There is a fabric filter to control particulate matter. The control efficiency of the filter is 90%.

MP5

This point is for catalyst and hardners application. The consumption of the material is 1.125 gallons hr. The "PTE" is based on 8760 hrs per year. The assumed transfer efficiency of the system is 60%. There is a fabric filter to control particulate matter. The control efficiency of the filter is 90%.

MP6

This point is for Reducer application. The consumption of the material is 1.875 gallons hr. The "PTE" is based on 8760 hrs per year. The assumed transfer efficiency of the system is 60%. There is a fabric filter to control particulate matter. The control efficiency of the filter is 90%.

MP7

This point is for clean up solvent. The consumption of the solvent is 1.875 gallons hr. The "PTE" is based on 8760 hrs per year. The assumed transfer capacity of the system is 60%. There is a fabric filter to control particulate matter. The control efficiency of the filter is 90%.

Emission Point 03 Abrasive Media Blast

This point is for the media blasting. The consumption of the plastic media is 300 lbs. per hr. The "PTE" is based on 8760 hrs per year. There is a fabric filter to control particulate matter. The control efficiency of the filter is 90%.

Emission Point 04 Orange Tooling

This point is for orange tooling. The consumption of the material is 0.0043 gallon/hr. There is no control of any pollutant at this point.

Emission Point 05 Mold Release Wax

This point is for mold release. The consumption of the material is 1.0 gallon/year. There is no control of any pollutant at this point.

Emission Point 06 Gel Coat Sanding

This point is for gel coat sanding. The consumption of the material is 1.0 gallon/year. There is no control of any pollutant at this point.

Emission Point 07 Filler and Putty

This point is for filler and putty. The consumption of the material is 1.0 gallon/year. There is no control of any pollutant at this point.

COMMENTS:

Type of control and efficiency:

Emission points 02 and 03 have fabric filters to control particulate matter. The control efficiency of the filter is 90 %.

Emission factors and their source:

AP –42 5th edition, mass balance, and "Composite Factors Associates (CFA) unified Emissions Factors for open molding for composite" are used for the emission factors for PM, VOC and HAPS.

Applicable regulation:

State regulation 401 KAR 59:010, New process operations, applies to these emissions points because these are process operations that were commenced after July 2, 1975.

EMISSION AND OPERATING CAPS DESCRIPTION:

The actual emissions of HAPS for a single pollutant shall not exceed 9.0 tons per year. The combined emissions for HAPs shall not exceed 22.5 tons per year. The actual VOC emissions shall not exceed 90.0 tons per year. These annual limitations shall not be exceeded during any consecutive twelve months period for the entire source.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.